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Joint Committee Issue Document

NOTE: An issue document may be submitted at any time – it comprises two parts: the cover sheet (this page) and a description of the issue to be submitted to the Joint Committee (following page). A separate issue form is required for each issue submitted. Issue papers include proposals for modification of a standard, information reports and (of current research, etc.). An issue paper shall be categorized as being for ACTION or for INFORMATION. Submitters should limit the Issue Paper to 1 or 2 pages – attachments detailing full recommendations or background information may be attached with supplementary information. The Chairperson of the appropriate Joint Committee will respond within 30 days of receipt of the issue document advising what steps will be taken. Any issue document intended for discussion at a Joint Committee meeting must be received at least 21 days prior to the meeting to ensure inclusion in the agenda.

Submit to:

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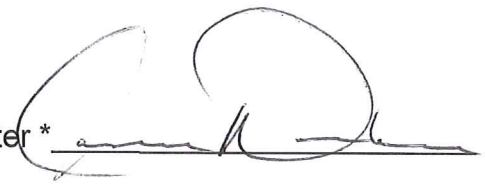
Signature of Submitter *  Date: 2/23/2010

**Type written name will suffice as signature*

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Please indicate if you wish the item to be considered as an action item or as an information item.

Action: ☒ Information: ☐

NSF Standard(s) Impacted:

2008 Version

5.35.7 Self service food shields

5.35.8 Food shields for use in elementary schools

Issue Statement:
Provide a concise statement of the issue, which reference as appropriate any specific section(s) of the standard(s) that are related to the issue.

The Food Shield Requirements Criteria as detailed in Annex C recognize that customers must be allowed reasonable access to the food and acknowledge that no food shield is 100% effective in protecting unpackaged food.

Standard 5.35.3 notes that the purpose of a food shield is to minimize the potential for contamination by a customer since no food shield is 100% effective.

The 2008 Standards 5.35.7 and 5.35.8 as written do not allow reasonable access to food and as a result, are likely to be circumvented.

Background:
Provide a brief background statement indicating the cause and nature of concern, the impacts identified relevant to public health, public understanding, etc, and any other reason why the issue should be considered by the Committee.

Based on field observations of servers and customers in a wide range of food service operations, the risk for cross contamination of food is increased when food shields interfere with access to the food.

In the vast majority of illnesses caused by human contamination of food, microbes are introduced by hands rather than coughs and sneezes. Food shields must allow reasonable access to food in order to allow the effective use of utensils to prevent contamination by hands.

Self-service

- Customers compensate for difficult reaches by crouching below the food shield and even resort to placing their head under the horizontal food shield glass. This clearly eliminates the food-mouth barrier.

- In some cases, food service operations elevate food at self-service stations to improve the reach for customers. This frequently impairs the ability of heated or refrigerated equipment to hold food at safe temperatures.

- Food shields that interfere with reasonable access to food increase the likelihood that customers will inadvertently touch the food with their hands while attempting to reach it.

Served

- At served stations, food shields must allow food servers to safely reach over (typically hot) food holding equipment as well as the food shield in order to pass food to customers. When food shield dimensions increase the distance required to transfer food from server to customer, potential benefits must be weighed against the risks including injuries from awkward body mechanics and burns due to spills.

- The proposed standard 5.35.8, food shields for use in elementary schools, represents an extreme example of the issues cited above. Food shield dimensions developed for cafeterias from adult anthropometrics have been applied to children aged 5 through 12. Although elementary school children vary in height, it is clear that the distance from server to customer is increased for most and is dramatically increased for younger students.

- Proposed standard 5.35.8 completely prohibits access to unpackaged food by elementary school students without any stated basis. What evidence indicates that the risk of food borne illness rises when elementary school children are allowed to self-serve portions of their meals?

- Proposed standard 5.35.8 has operational and cost implications that impact staffing requirements, food production and portioning, food waste and speed of service in thousands of existing elementary schools at a time when school budgets are inadequate and childhood obesity is epidemic.

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Recommendation:

If action by the Joint Committee is being requested, clearly state what action is needed: e.g., recommended changes to the standard(s) including the current text of the relevant section(s) indicating deletions by use of ~~strike-out~~ and additions by highlighting; e.g., reference of the issue to a Task Force for detailed consideration; etc. If recommended text changes are more than a half page, please attach a separate document.

1. Postpone implementation of 2008 standards
2. Establish a task group with representation from all stakeholders: food service operators serving a wide range of customers, foodborne illness researchers; health departments; equipment manufacturers; foodservice designers
3. Charge the task group with evaluating risks contributing to foodborne illness
4. Develop food shield criteria that minimizes risk and allows reasonable access with a goal of achieving widespread acceptance and universal application

Supplementary Materials (photographs, diagrams, reports, etc.):

If not provided electronically, the submitter will be responsible to have sufficient copies to distribute to committee members.

Illustrations 1-5 show a typical serving counter at 34" AFF with 12" tray slide and the inside edge of the food pan is indicated by masking tape line. The food shield shown meets the 2008 standard 5.35.7 for a self-service station. Photo 1 shows the leading vertical edge of the glass is 13" above the counter surface and the minimum horizontal distance is 9.75" (.75 x 13"). Photo 2 shows that with 16" glass, x + y = 22". A female customer of average height (5'6") is able to reach only 4" into the food pan before her arm is obstructed by the leading edge of glass. To extend her reach, the customer must stretch her body across the food shield, losing sight of the food, or crouch below the food shield glass.

Illustrations 7-12 show a typical serving counter at 34" AFF with 12" tray slide and the inside edge of the food pan is indicated by masking tape line. The food shield shown meets the 2008 standard 5.35.12 for a cafeteria served station, and therefore for elementary schools. With 16" vertical glass and 16" horizontal glass, x + y = 32" and the horizontal glass, where food is passed from server to customer is 52"AFF. The gap between the horizontal and vertical glass planes of glass is less that 3/4", with 3" from front leading edge to inside edge of food pan and 1-1/2" from the front leading edge of the glass to the serving counter surface. Photos 10, 11 and12 show reaches for elementary school students aged 11, 9, and 6.

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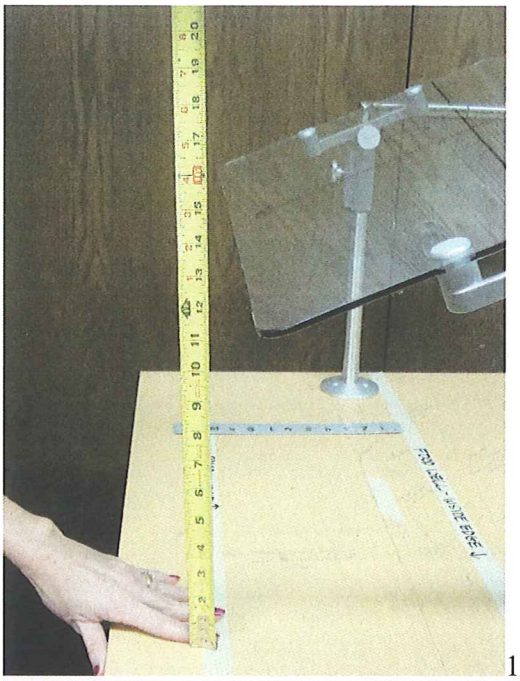
Submitter: Connie Dickson_____ Date: February 23, 2010_____



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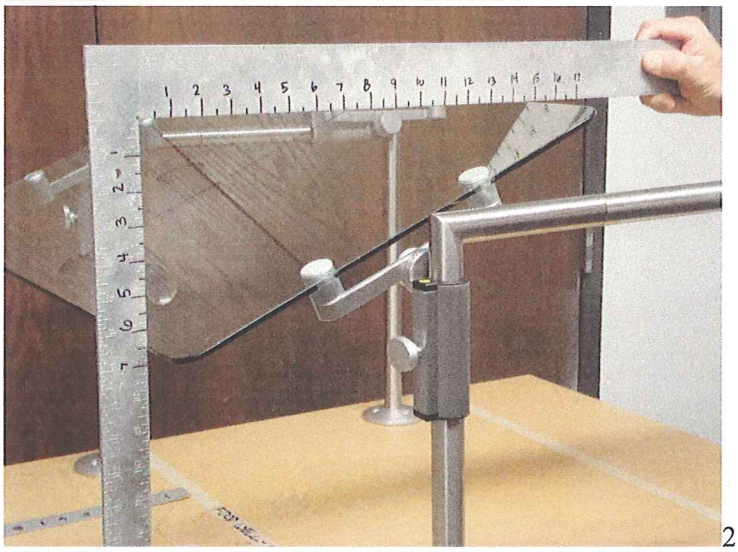

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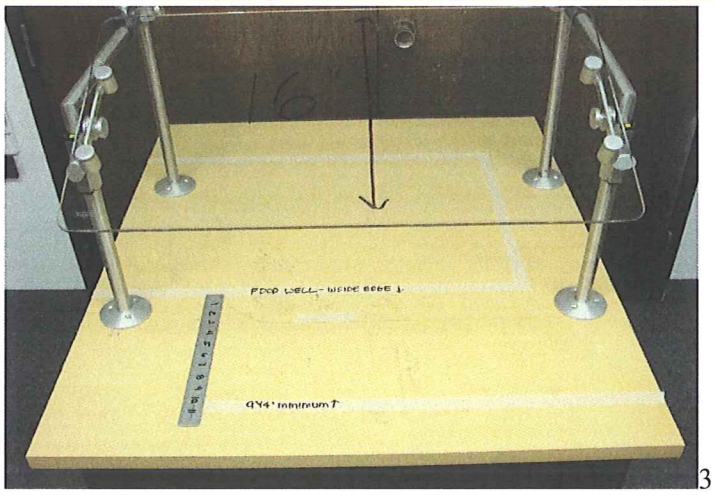

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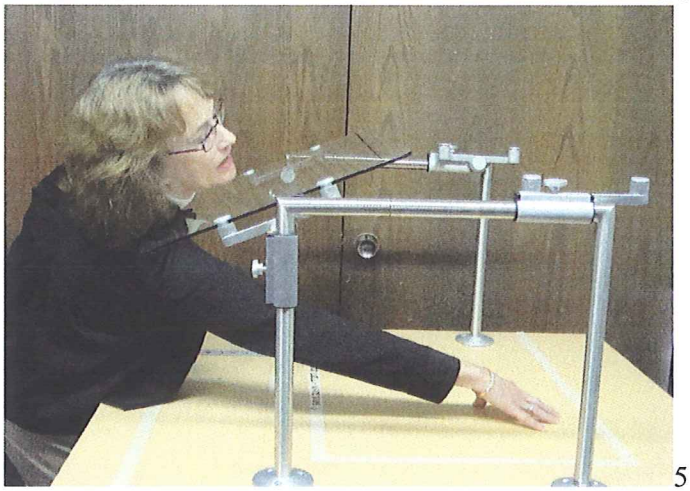

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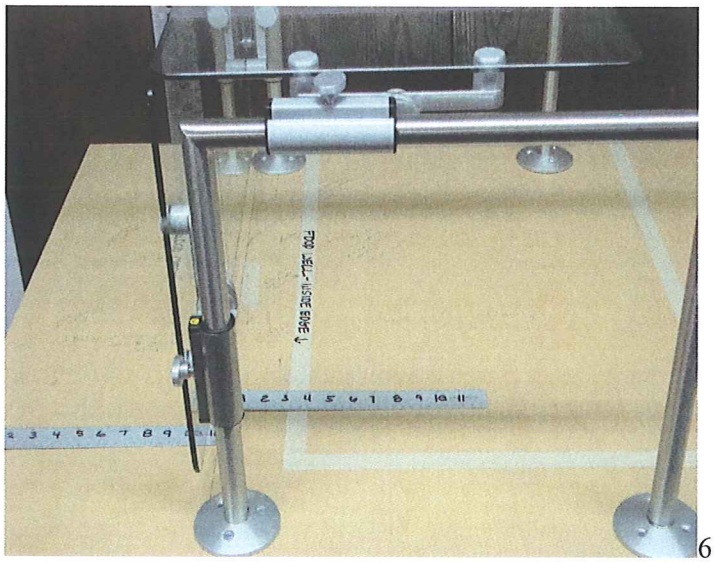

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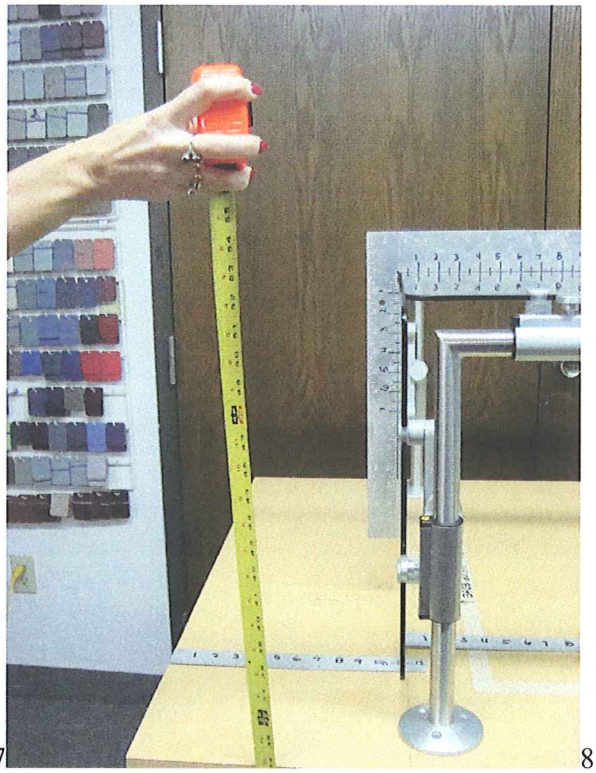

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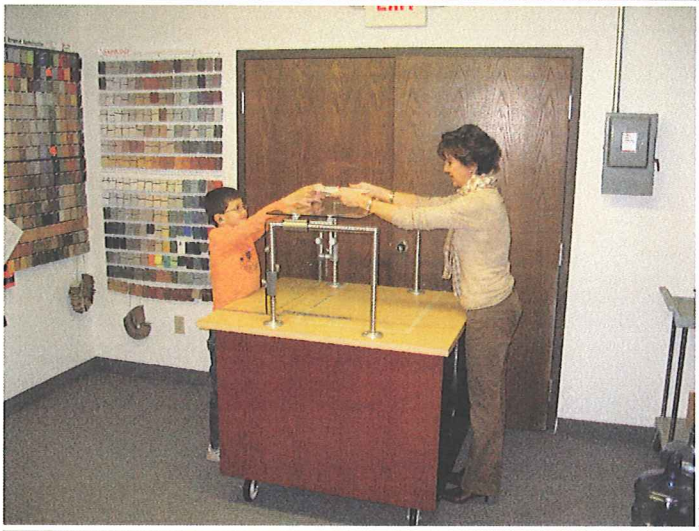
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